



Frankfort Plant Board

Water
Cable
Electric
Security
Local Phone
Digital Cable
Long Distance
Community TV
Ethernet/Internet
Cable Modem/ISP
Cable Advertising

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SEP 25 2014
PUBLIC SERVICE
COMMISSION

September 25, 2014

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, KY 40602-0615

RE: Case No. 2014-00254

Dear Mr. Derouen:

Enclosed for filing please find an original and six (6) copies of FEWPB's Motion for Leave to File Requests for Information to Intervenors.

I appreciate your assistance. If you have any questions or require additional information, please contact me at (502) 352-4541 or hprice@fewpb.com.

Sincerely,

Kathy Poe
Paralegal

kp

Enclosures

cc: Donald T. Prather, Esq.
Raymond Edelman, Esq.
Jennifer Black Hans, Esq.
Gregory T. Dutton, Esq.

Equal Opportunity/Affirmative Action Employer

317 West Second Street (P.O. Box 308) Frankfort, Kentucky 40602 Phone (502) 352-4372
Fax (502) 223-3887 www.fpb.cc

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

SEP 25 2014

PUBLIC SERVICE
COMMISSION

In the Matter of:

Proposed Adjustment of the Wholesale)
Water Service Rates of Frankfort)
Electric and Water Plant Board)

Case No. 2014-00254

**MOTION FOR LEAVE TO FILE REQUESTS FOR INFORMATION TO
INTERVENORS**

Pursuant to the Commission's September 17, 2014 Scheduling Order entered in this matter, Frankfort Plant Board ("FPB") respectfully requests permission to file its requests for information to the Intervenor in two stages. In support of this Motion, FPB notes that the statutory deadline for the Commission to issue a decision in this matter is April 24, 2015. As such, extensions of the procedural schedule may prove difficult. The Scheduling Order notes that Intervenor testimony is to be filed on October 29, 2014. FPB then has until November 5, 2014 to file its requests for information, the responses to which are due thirteen (13) days later on November 18, 2014.

The Scheduling Order permits only one (1) round of requests for information. FPB asks that it be permitted to propound its requests that do not relate to Intervenor testimony immediately, and later after Intervenor testimony is filed, be permitted to propound requests related to that testimony. By allowing an early submission of some of the FPB's data requests that can be answered prior to the preparation of testimony, the Intervenor will be afforded more time to complete their responses, easing the time burden imposed by the procedural schedule. Intervenor will have more time to answer

than the thirteen (13) days currently allotted, reducing the need for potential extensions of the procedural schedule. The number and type of questions to the Intervenor will not be affected by this dual submission, only the time for response.

WHEREFORE, FPB respectfully requests that it be permitted to propound requests unrelated to Intervenor testimony immediately, and later, on November 5, 2014 to propound requests related to Intervenor testimony.

On this the 25th day of September, 2014.

Respectfully Submitted,

Hance Price

Hance Price
317 W. Second Street
P.O. Box 308
Frankfort, KY 40602

Attorney for Frankfort Electric and
Water Plant Board

AND

John N. Hughes / J. N. Hughes

John N. Hughes
Attorney at Law
124 W. Todd St.
Frankfort, KY 40601

Attorney for Frankfort Electric and
Water Plant Board

CERTIFICATE OF SERVICE

I, Hance Price, certify that on the 25th day of September 25, 2014 an original and six (6) copies of this Motion for Leave to File Requests for Information to Intervenors was served by hand delivery to:

Mr. Jeff Derouen, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

Counsel further certifies that true and accurate copies of the Motion were served by mail to:

Kentucky Attorney General's Office
Hon. Jennifer Black Hans
Hon. Gregory T. Dutton
Assistant Attorneys General
1024 Capital Center Drive
Suite 200
Frankfort, KY 40601

Hon. Donald T. Prather
500 Main Street, Suite 5
Shelbyville, KY 40065

Hon. Raymond Edelman
148 South Main Street
Lawrenceburg, KY 40342

Hance Price
Hance Price